

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

Mahmoud KHALIL,

*Petitioner,*

v.

Donald J. TRUMP, in his official capacity as President of the United States; William P. JOYCE, in his official capacity as Acting Field Office Director of New York, Immigration and Customs Enforcement; Caleb VITELLO, Acting Director, U.S. Immigration and Customs Enforcement; Kristi NOEM, in her official capacity as Secretary of the United States Department of Homeland Security; Marco RUBIO, in his official capacity as Secretary of State; and Pamela BONDI, in her official capacity as Attorney General, U.S. Department of Justice,

*Respondents.*

Case No. 25-cv-1935 (JMF)

**NOTICE OF MOTION FOR  
RELEASE UNDER *MAPP V. RENO***

PLEASE TAKE NOTICE that, upon the accompanying memorandum of law and supporting declaration and exhibits, Amended Petition, and previously filed briefing in this action, Plaintiff-Petitioner Mahmoud Khalil, through counsel, hereby moves this Court for an order of immediate release under *Mapp v. Reno*, 241 F.3d 221 (2d Cir. 2000).

Dated: March 14, 2025

Respectfully submitted,

**WASHINGTON SQUARE LEGAL SERVICES,  
INC.**

**IMMIGRANT RIGHTS CLINIC**

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**CENTER FOR CONSTITUTIONAL RIGHTS**

/s/

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**NEW YORK CIVIL LIBERTIES UNION  
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/s/

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